

Hearing Date and Time: July 12, 2016 at 10:00 a.m. (Eastern Time)
Objection Deadline: July 5, 2016 at 4:00 p.m. (Eastern Time)

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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Chapter 11

In re:

LEHMAN BROTHERS HOLDINGS INC., et al.,
Debtor.

Case No. 08-13555 (JMP)
(Jointly Administered)

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**SUNNY BANK LTD.'S RESPONSE TO PLAN ADMINISTRATOR'S FIVE
HUNDRED EIGHTEENTH OMNIBUS OBJECTION TO CLAIMS
(SATISFIED GUARANTY CLAIMS) WITH RESPECT TO PROOF OF
CLAIM NUMBER 50143**

Sunny Bank, Ltd. ("Sunny Bank"), by and through its counsel, Clyde & Co US LLP, hereby files this response (the "Response") to the objection (the "Motion") filed by Lehman Brothers Holding Inc. ("LBHI" or "Plan Administrator", as applicable), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors (the "Plan"), to proof of claim number 50143 (the "Claim"), and respectfully states as follows:

1. The Plan Administrator states that each claim identified in Exhibit A to LBHI's Motion, including the Sunny Bank's Guaranty Claim, corresponds to a Primary Claim asserted against Lehman Brothers Asia Holdings Limited ("LBAH"). Motion ¶ 1. The Plan

Administrator further asserts that, by virtue of distributions and payments made on account of Sunny Bank's Primary Claim, Sunny Bank's Claim has been satisfied in full and should be disallowed and expunged. Motion ¶¶ 1, 2.

2. The Claim filed by Sunny Bank was in the total amount of \$14,053,808.12.
3. Although the Plan Administrator states that the Claim has been satisfied in full, our firm has been advised by Sunny Bank that its Claim has not been satisfied in full. Sunny Bank calculates the full amount of its Primary Claim to be \$14,158,242.67, which includes the principal amount of \$14,000,000 plus interest of \$158,242.67 calculated through November 19, 2008.
4. Sunny Bank further advises that, with respect to its Primary Claim, it has received distributions and payments totaling \$14,136,108.95, which is \$22,133.72 less than the amount of its Primary Claim. As such, because Sunny Bank takes the position that its Claim has not been satisfied in full, its Claim should not be disallowed and expunged.

RESERVATION OF RIGHTS

Sunny Bank expressly reserves the right to supplement this Response and proffer evidence with respect to the allowance of the Claim.

CONCLUSION

WHEREFORE, for the reasons set forth herein, Sunny Bank respectfully requests that the Court enter an Order (a) denying the Motion with respect to Sunny Bank's Claim or, alternatively, (b) granting Sunny Bank such other relief as the Courts deems just and appropriate under the circumstances.

Dated: New York, New York
July 5, 2016

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